

IOWA STATE UNIVERSITY

University Extension

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FAX TRANSMITTAL

DATE: April 15, 2003

TO: Kenneth R. Payne, Chief; Marketing Programs Branch

FROM: Marcia Langner

RE: Docket No. LS-02-15

FAX: 202/720-1125

Number of pages to follow cover page: Zero

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Message: The Clay County 4-H program acts as the agent for 4-H swine project members that bring swine to the Clay County Fair each year. Since this is a terminal show all market and derby swine exhibits are sold for harvest and have pork checkoff dollars assessed. The proposed rule, which may require, upon request by USDA, reminders of pork checkoff assessments to submit to AMS the names, addresses, and any other information deemed necessary to identify persons from whom assessments were collected raises some concern. Between the years of 1997 and 2002 the Clay County 4-H program has had anywhere from 93 to 132 exhibitors who brought market swine to our fair. Most of these exhibitors are county 4-H members, the rest are district 4-H'ers who may reside throughout Iowa or the Southern part of Minnesota. Every year names and addresses of exhibitors are collected and recorded in our computers using a "File Maker" program. However, after the fair business is completed and before new entries are recorded the computer records are erased. Entry and sales paper records are kept on file in storage but would not be easily assessable for possible collection requirements. Other information that may be deemed necessary to identify persons for whom assessments were collected may not have been recorded during our entry and sales process. We do not require social security numbers or farm identification numbers for swine project members. If past records were requested the time and cost to retrieve them would be burdensome and time consuming. Staff turnover and changing responsibility for assessing checkoff dollars, recording, and filing records also adds to the difficulty that maybe incurred for collection requirements.

In the past three years all of our market swine exhibitors have had to submit copies of Pork Quality Assurance (PQA) certification. Copies of those certificates are on hand but not currently recorded electronically. Many of the 4-H & FFA market swine shows require PQA certification of exhibitors since most are terminal shows. The National Pork Board already has a record of youth PQA certified swine producers, it could be advantageous to use that existing database rather than request each county Extension office to duplicate the records.

The AMS estimate for the time required to complete this task, of 1 hour per respondent at a cost of \$20 per hour, seems very low - Even if the request came in for records that were currently on the computer. Estimated average of 4 hours per respondent to submit information by those entities that do not maintain their records electronically, is extremely low. To retrieve previously filed records of 100 or more individuals, verify that each individual sold swine projects, cross check individual addresses, and collect any other information that maybe deemed necessary, plus organize and compile complete information in a form that could be submitted could be quite time consuming.